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12/23/2013

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

THE BOARD OF TRUSTEES
OF THE LELAND STANFORD
JUNIOR UNIVERSITY,

Plaintiff,

vs.

CHIANG FANG CHI-YI, ET
AL.,

Defendants.

Case No. CV13-04383 EJD

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT BY
NOT MORE THAN 30 DAYS
(L.R. 8-3)**

Complaint Filed:	September 20, 2013
Per Fed. R. Civ. Proc. 4(d)(3)	
Current Response Date:	December 30, 2013
New Response Date:	January 30, 2014

1 WHEREAS Plaintiff THE BOARD OF TRUSTEES OF THE LELAND
2 STANFORD JUNIOR UNIVERSITY (“Plaintiff”) filed and served its Complaint
3 in Interpleader pursuant to Rule 4(d)(3) of the Federal Rules of Civil Procedure
4 upon Defendant Chiang Yomei a/k/a Yomei Chiang (“Defendant”) on September
5 20, 2013;

6 WHEREAS Defendant’s response to the Complaint is currently due on
7 December 30, 2013;

8 WHEREAS Defendant has requested, and Plaintiff has granted, an extension
9 of thirty (30) days for Defendant to respond to the Complaint, through and
10 including January 30, 2014;

11 WHEREAS this is the first and only extension of time to respond to the
12 Complaint that Defendant has requested; and

13 WHEREAS nothing contained in this stipulation is intended to be, nor is it,
14 an admission by Defendant as to the validity of jurisdiction or venue, nor shall it
15 constitute a waiver of the right to object to personal jurisdiction or to venue.

16 IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

17 1. Defendant shall have to and including January 30, 2014 in which to
18 respond to the Complaint;

19 2. Nothing contained in this stipulation is intended to be, nor is it, an
20 admission by Defendant as to the validity of jurisdiction or venue, nor shall it
21 constitute a waiver of the right to object to personal jurisdiction or to venue.

22 3. This Stipulation is without prejudice to any party’s rights, remedies,
23 defenses, or positions in the case.

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1 Dated: December 20, 2013

MANATT, PHELPS & PHILLIPS LLP

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3 By /s/
4 Shari Mulrooney Wollman
5 *Attorneys for Defendant*
6 *Chiang Yo-mei (a/k/a Yo-Mei Chiang)*

7 Dated: December 20, 2013

PILLSBURY WINTHROP SHAW
PITTMAN LLP

8
9 By /s/
10 Mark D. Litvack
11 *Attorneys for The Board of Trustees*
12 *of the Leland Stanford Junior*
13 *University*

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